

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

THE GENERAL LAND OFFICE OF
THE STATE OF TEXAS, et al.,

Plaintiffs,

V.

JOSEPH R. BIDEN, in his official
capacity as President of the United
States of America, et al.,

Defendants.

Civil Action No. 7:21-CV-00272

THE STATE OF MISSOURI; and
THE STATE OF TEXAS,

Plaintiffs,

V.

JOSEPH R. BIDEN, in his official
capacity as President of the United
States of America, et al.,

Defendants.

**Civil Action No. 7:21-CV-00420
(formerly No. 6:21-cv-00052)**

**UNOPPOSED MOTION TO EXCEED WORD LIMIT FOR CONSOLIDATED REPLY
IN SUPPORT OF SIERRA CLUB AND SOUTHERN BORDER COMMUNITIES
COALITION’S MOTION TO INTERVENE**

Proposed Defendants-Intervenors, Sierra Club, and Southern Border Communities Coalition (collectively, “Sierra Club Intervenors” or “Proposed Intervenors”) filed a motion to intervene in this case on April 19, 2024. ECF No. 167. The parties filed responses on May 10, 2024, ECF Nos. 184, 185, with each brief extended to 8,000 words. ECF No. 178. According to the Court’s procedures, Sierra Club Intervenors’ reply to the parties’ responses is due on May 17,

2024. *See* Court Procedures Rule 16.c. Sierra Club Intervenor intend to respond to the Plaintiffs' and Defendants' responses in one consolidated reply of no more than 3,500 words. The parties will not be prejudiced by this request, and they do not object to the requested word-limit extension. Similarly, proposed intervenors Diamond A. Ranch, Texas Sterling, Southern Border Constructions, and RKE Contractors do not object to the asked for word-limit extension.

The Court should grant Sierra Club Intervenor's requested word-limit extension for the preceding reasons. A proposed order is attached.

Date: May 15, 2024

Respectfully submitted,

/s/ David Donatti

Counsel for Proposed Defendants-
Intervenor Sierra Club and Southern
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**Pro hac vice* application submitted
**Attorney for Proposed Defendant-
Intervenor Sierra Club only
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Coalition only

CERTIFICATE OF CONFERENCE

I hereby certify that on May 15, 2024, I communicated with counsel for Defendants, Plaintiffs, and all other proposed intervenors in this action to request their position on the relief sought in this motion. All parties and proposed intervenors consent to this motion.

/s/ David Donatti

David Donatti

CERTIFICATE OF WORD COUNT

I certify that the total number of words in this motion, exclusive of the matters designated for omission, is 160, as counted by Microsoft Word.

/s/ David Donatti

David Donatti

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2024, I electronically filed a copy of the foregoing motion. Notice of this filing will be sent via email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ David Donatti

David Donatti